

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SHEILA ALLEN, individually and on behalf of all others similarly situated,

Plaintiff,

v.

JP MORGAN CHASE BANK, N.A.,

Defendant.

Case No. 13-cv-08285

Assigned to the Honorable Rebecca R. Pallmeyer

Magistrate Judge Schenkier

JOINT MOTION TO CONTINUE HEARING ON PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

Defendant JPMorgan Chase Bank, N.A. (“Chase”), by its counsel, and plaintiff Sheila Allen (“Plaintiff” and together, with Chase, the “Parties”), by her counsel, respectfully move for a continuance of the current April 29, 2015 hearing on Plaintiff’s anticipated motion for preliminary approval of class action settlement and, in support thereof, state as follows:

1. On March 9, 2015, the Parties advised the Court that they had reached a settlement in principle and that they had exchanged initial drafts of the settlement agreement without exhibits. As a result, the Court preliminarily set the hearing date on Plaintiff’s anticipated motion for preliminary approval of class action settlement for April 29, 2015.

2. While the Parties have finalized the agreement and have exchanged drafts of the exhibits, the Parties require additional time prior to the filing by Plaintiff of her anticipated motion to compile a class list.

WHEREFORE, the Parties respectfully request that the current hearing date for Plaintiff’s anticipated motion for preliminary approval of class action settlement be continued

from April 29, 2015 to May 19, 2015 at 10:00 a.m., or as soon thereafter as is convenient for the Court. Plaintiff will file her anticipated motion seven days prior to the hearing.

Dated: April 22, 2015

Respectfully submitted,

For JPMORGAN CHASE BANK, N.A.

By:

/s/ Arjun P. Rao

Julia B. Strickland
Arjun P. Rao (admitted *pro hac vice*)
Stroock & Stroock & Lavan LLP
2029 Century Park East, 16th Floor
Los Angeles, CA 90067
Telephone: 310-556-5800
Fax: 310-556-5959
Email: lacalendar@stroock.com

Gloria R. Mitka
Associate General Counsel
JPMorgan Chase Legal Department
10 S. Dearborn, Floor 20 (IL-0287)
Chicago, IL 60603
Telephone: 312-732-3245
Fax: 312-732-8040
Email: Gloria.mitka@jpmchase.com

Dated: April 22, 2015

For SHEILA ALLEN

By:

/s/ Keith J. Keogh

Keith J. Keogh
Keogh Law, Ltd.
55 W. Monroe, Ste. 3390
Chicago, IL 60603
Telephone: 312-374-3403
Fax: 312-726-1093
Email: keith@keoghlaw.com

Alejandro Caffarelli
Caffarelli & Associates Ltd.
214 South Michigan Ave., Ste. 300
Chicago, IL 60604
Telephone: 312-763-6880
Email: acaffarelli@caffarelli.com

CERTIFICATE OF SERVICE

I, Julia B. Strickland, hereby certify that on April 22, 2015, I caused a true and accurate copy of the foregoing **Joint Motion To Continue Hearing On Plaintiff's Motion For Preliminary Approval Of Class Action Settlement**, to be filed via the courts CM/ECF online system, which sent notice via email to all parties of record as indicated above.

/s/ Arjun P. Rao

Arjun P. Rao